

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 0:23-cv-61203**

THE SMILEY COMPANY SPRL,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendants

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

Pursuant to Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission pro hac vice of Jiyuan Zhang, Esq. of the law firm of J. Zhang and Associates, P.C., 37-12 Prince Street, Ste 9C, Flushing, NY 11354, 718-701-5098, for purposes of appearance as co-counsel on behalf of Defendants represents Pogah, OVOY Inc., Likorh, UTOWO, and TuopuSiLe (together, "Defendants"), in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Jiyuan Zhang, Esq. to receive electronic filings in this case, and in support thereof states as follows:

1. Jiyuan Zhang, Esq. is not admitted to practice in the Southern District of Florida and is a member in good standing of the New York State Bar and the Southern District of New York, Eastern District of New York and Northern District of Illinois.
2. Movant, Jianyin Liu, Esquire, of the law firm of The Law Offices of James Liu PLLC, 15750 SW 92nd Ave Unit 20C, Palmetto Bay, FL 33157, (305) 209 6188, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system.
3. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.
4. In accordance with the local rules of this Court, Jiyuan Zhang, Esq. has made payment of this Court's \$200.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.
5. Jiyuan Zhang, Esq., by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Jiyuan Zhang, Esq. at email address: JZ@jzhanglaws.com.

WHEREFORE, Jianyin Liu, Esq., moves this Court to enter an Order Jiyuan Zhang, Esq., to appear before this Court on behalf of Pogah, OVOY Inc., Likorh, UTOWO, and

TuopuSiLe, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Jiyuan Zhang, Esq. at JZ@jzhanglaws.com.

Date: 08/30/2023

Respectfully submitted,

/s/ Jianyin Liu

Jianyin Liu, Esq.

FBN: 1007675

The Law Offices of James Liu PLLC

15750 SW 92nd Ave Unit 20C

Palmetto Bay, FL 33157

jamesliulaw@gmail.com

Ph: (305) 209 6188

Attorneys for Pogah, OVOY Inc., Likorh,
UTOWO, and TuopuSiLe

CERTIFICATE OF SERVICE

I CERTIFY that on August 30, 2023 the foregoing was electronically filed on CM/ECF, which will serve it via electronic mail to counsel of record.

/s/ Jianyin Liu